

**REMARKS**

Applicants thank the Examiner for the telephone interview conducted on August 12, 2004. In that interview, claims 1, 3, 4, and 5, and U.S. Patent No. 5,872,928 were discussed. The differences between configuration records and device-specific configuration instructions were also discussed. The centralized storage of configuration records and device-specific configuration instructions were also discussed.

Claims 1 through 20 are canceled and new claims 21 through 31 are added. These new claims more clearly define Applicants' invention, and applicants respectfully request that they be considered.

Claim 21 recites, among other elements, "merging the capability-configuration data and the actual-configuration data into a configuration record." The claim states that the "capability-configuration data" includes substantially all commands that can be used to configure the network device. And as the claim language indicates, the "actual-configuration data" is the actual configuration data for the network device.

*Lewis* does not teach or suggest this "merging" limitation of claim 21 because *Lewis* does not teach or suggest the use of capability-configuration data or actual-device configuration data. Remember that claim 21 defines "capability-configuration data" as including "substantially all commands that can be used to configure the network device." In essence, the recited "capability-configuration data" represents what a network device can do rather than what it is configured to do. *Lewis*' configuration record does not include "capability-configuration data," and in particular, the configuration record does not include substantially all of the commands that can be used to configure the network device.

Even assuming that *Lewis* taught using some type of capability data, *Lewis* does not disclose storing substantially all of the commands that can be used to configure the network device in a configuration record. For example, *Lewis* discloses that its configuration records are formed using templates. These templates allow a user to create configuration records with a subset of the available attribute-value pairs available for a network device. Templates are a way to screen or filter information from an existing configuration and create a configuration record with only select data. Thus, by definition, the *Lewis* configuration records could not, and would not want to, include all of the attribute-value pairs that are available to a network device.

Additionally, *Lewis*' configuration records reflect a subset of the actual configuration of a network device. These configuration records do not reflect substantially all of the capabilities of the network device. Accordingly, *Lewis*' configuration records cannot include "capability-configuration information" as recited in claim 21.

Regarding claim 27, it recites "generating the configuration record by combining the first configuration data and the second configuration data into a configuration record for the network device." The claim states that the first configuration data indicates substantially all of the capabilities of the network device and that the second configuration data includes substantially all of the information about how the network device is currently configured to operate. *Lewis* does not teach or suggest this "generating" limitation.

First, *Lewis* does not teach or suggest a configuration record that indicates substantially all of the capabilities of a network device. *Lewis*, instead, discloses storing

information about what a device is configured to do—not what it can be configured to do—in a configuration record. And by using templates to create its configuration records, *Lewis* is expressly attempting to avoid recording the full configuration of the network device in the configuration record.

Second, *Lewis* does not teach or suggest second configuration data that includes substantially all of the information about how the network device is currently configured to operate. And again, by using templates to create its configuration record, *Lewis* is expressly attempting to avoid recording the full configuration of the network device in the configuration record.

Claim 27 also requires “storing the configuration record in a repository of configuration records.” *Lewis* does not store its version of a configuration record in a repository of configuration records.

Regarding claim 30, it is allowable for reasons similar to those described in relation to claim 27.

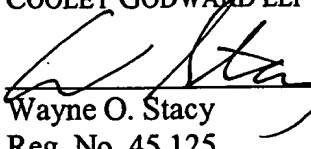
### **CONCLUSION**

In view of the foregoing, Applicants respectfully submit that no further impediments exist to the allowance of this application and, therefore, solicit an indication of allowability. However, the Examiner is requested to call the undersigned if any question or comments arise.

The Commissioner is hereby authorized to charge any appropriate fees under 37 C.F.R. §§1.16, 1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 50-1283.

COOLEY GODWARD LLP  
Attention: Patent Group  
One Freedom Square - Reston Town Center  
11951 Freedom Drive  
Reston, Virginia 20190-5601  
Tel: (720) 566-4125  
Fax: (720) 566-4099

By:

COOLEY GODWARD LLP  
  
Wayne O. Stacy  
Reg. No. 45,125